

Riverside Tool Corp. Response
Attachment 6

Wastewater Discharge Permit Application



CITY OF ELKHART PUBLIC WORKS & UTILITIES INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION

*Unless otherwise stated, fill out completely.
If an item is not applicable, indicate by noting "NA".
Do Not Leave Any Blank Spaces.*

Section 1 Applicant and Facility Description

1. Name of Facility Riverside Tool Corp.

2. Mailing Address P.O. Box 1425, Elkhart, IN 46515

3. Facility Address 3504 Henke St., Elkhart, IN 46514

4. I certify that I am familiar with the information contained in this application and that to the best of my knowledge and belief such information is true, complete and accurate.

Ronald Migedt

President

Printed Name of Signing Official

Title

Signature of Signing Official

Date

5. Applicant's Authorized Agent or Contact Official

Ronald Migedt

President

Name

Title

Mailing Address: P.O. Box 1425, Elkhart, In 46515

Telephone Number: 574 - 522 - 6798

Email Address: ron@riversidetool.com

Permit # NA

(if applicable)

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Section 2 Plant Operations															
<p>1. Provide a <u>DETAILED</u> written description of the manufacturing process or service activity provided on the premises (use additional sheets if necessary). <i>Include a flow diagram clearly identifying each process step.</i></p> <p align="center">See Attached Document Titled Section 2</p>															
<p>2. Principle raw materials used: _____</p> <p align="center">See Attached Document Titled Section 2</p>															
<p>3. Chemicals and compounds used (include MSDS for each)</p> <p align="center">See Attached Document Titled Section 2</p>															
<p>4. Hours of process discharge into the sewer system per day: _____</p> <p align="right">See Attached Document Titled Section 2</p>															
<p>5. List any environmental control permits held by or for the facility (including a discharge permit issued by the city). Please include all applications presently being reviewed by any regulatory agency. Please include all associated permit numbers.</p> <p align="center">NA</p>															
<p>6. List all products manufactured or services provided by your facility along with the corresponding SIC number according to the Standard Industrial Classification Manual, Bureau of Budget, 1972 as amended:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; width: 50%;">Product or Service</th> <th style="text-align: center; width: 50%;">SIC Code</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; border-bottom: 1px solid black;">Cutting Tools</td> <td style="text-align: center; border-bottom: 1px solid black;">3545</td> </tr> <tr> <td style="text-align: center; border-bottom: 1px solid black;">Electroplating</td> <td style="text-align: center; border-bottom: 1px solid black;">3471</td> </tr> <tr> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> </tr> <tr> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> </tr> <tr> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> </tr> <tr> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> <td style="text-align: center; border-bottom: 1px solid black;">NA</td> </tr> </tbody> </table>		Product or Service	SIC Code	Cutting Tools	3545	Electroplating	3471	NA	NA	NA	NA	NA	NA	NA	NA
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Cutting Tools	3545														
Electroplating	3471														
NA	NA														
NA	NA														
NA	NA														
NA	NA														

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Section 3 Water Usage and Discharge Information

1. List intake water sources and volume:

Municipal Water Service	<u>521</u>	gallons/day
Private Well	<u>0</u>	gallons/day
Surface Water	<u>0</u>	gallons/day
Other <u>NA</u>	<u>NA</u>	gallons/day
Total	<u>521</u>	gallons/day

2. List average volume of discharge or water loss:

City Sewer System	<u>521</u>	gallons / day
Natural Outlet (Pond, etc.)	<u>0</u>	gallons / day
Waste Hauler	<u>11.26</u>	gallons / day
Evaporation	<u>3.55</u>	gallons / day
Contained in Product	<u>NA</u>	gallons / day
Other <u>NA</u>	<u>NA</u>	gallons / day
Est. 30 Minute Peak Flow	<u>NA</u>	gallons / day
Total	<u>535.81</u>	gallons / day

3. List average water usage within the facility:

Process waste stream #1	<u>2.73</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No
Process waste stream #2	<u>8.52</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No
Process waste stream #3	<u>NA</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input type="checkbox"/> No
Process waste stream #4	<u>NA</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input type="checkbox"/> No
Contact cooling water	<u>NA</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input type="checkbox"/> No
Non-contact cooling water	<u>NA</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input type="checkbox"/> No
Sanitary water*	<u>521</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No
Boiler/Air Conditioner	<u>NA</u>	gallons / day	Metered <input type="checkbox"/> Yes/ <input type="checkbox"/> No

**Sanitary Flow may be estimated at 15 GPD per employee, unless a more accurate method is available.*

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4. Describe how each waste stream listed above is generated:

- | | |
|-----------------|---|
| #1 | SIC 3545 – Lubricants, Coolants, and Cleaning Solutions are re-circulated inside machinery until they need replacement. At that point, they are transferred to a designated container for later disposal with Safety Kleen Systems, Inc. |
| #2 | SIC 3471 – De-ionized water used in the electroplating process is transferred to the designated container when replacement is needed. The waste is later disposed of by Safety Kleen Systems, Inc. |
| #3 | NA |
| #4 | NA |
| Contact Cooling | NA |

5. Is discharge to the sewer Continuous ☐ Yes/☒ No Batch ☐ Yes/☒ No

If batch: Circle frequency of Discharge: _____ times per day / mo / yr

Volume: _____ gallons per batch

6. Attach a **detailed schematic process diagram of the facility** showing the locations of sewers referenced in Number 7 and the location of SIC processes referenced in sections 2-6. Show the locations of sampling points (both Federal Categorical and POTW) and the location of the pretreatment facility, if applicable.

7. List plant sewer outlets, size and flow (assign sequential reference number to each sewer starting with number 1; identify these on the schematic)

Reference Number	Sewer Size (inches)	Description of Sewer Location	Average Flow (GPD)
1	4"	Southside Center of Building 1	148.8
2	4"	Southeast Corner Building 2	150
3	4"	Northeast Corner Building 2	13.68
4	4"	Southeast Corner Building 3	208.32

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8. Do you have any of the following currently in use or in future plans:

	Current	Planned
Flow Metering:	<input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No
Sampling Equipment:	<input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No
Monitoring Equipment: (pH, Temp., TOC, etc.)	<input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes/ <input checked="" type="checkbox"/> No

List all potable water metering devices including manufacturer, model and locations:
Southwest Corner of Building 2. Two municipal water meters are present. One for the lawn sprinklers, 1 1/2" Neptune T-10 60146356. The other for the building water supply, 2" Neptune Trident 10 31865782.

List all wastewater metering devices including manufacturer, model and locations: NA

Use additional sheets if necessary.

Section 4 Pretreatment

1. If applicable, describe all Federal Categorical Pretreatment Standards that apply to all processes in your facility (40 CFR Part 403).

NA

2. If any Federal Pretreatment Standards apply to your facility for its processes, and such standards are not yet being met, please include a compliance schedule according to 40 CFR Part 403.12(b)(7).

NA

3. Describe any wastewater treatment equipment or process in use and identify its location on the schematic.

NA

4. Describe any additional pretreatment facilities and processes under consideration. Include a specific timetable for completion:

NA

5. Do you have a spill prevention, containment and control plan (SPCC) or RCRA contingency plan for your facility? ☐Yes/☒No – **Riverside Tool Corp. does not meet criteria (1,320 gallons of above-ground oil storage capacity) to be subject to SPCC regulations. However we have formed a plan to handle spills and have attached that document to this application.**

If yes, please include a copy.

6. Do you utilize the city sewer to dispose of solvents, sludges or hazardous materials: ☐Yes/☒No

If yes, describe the materials and provide an estimate for annual frequency and quantity disposed.

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5. Are solvents, sludges or hazardous materials transported and disposed off-site: ☒ Yes/☐ No

If yes, explain: **All liquid waste from manufacturing processes is disposed of using Safety Kleen Systems, Inc.**

8. Please indicate on Table 1 Pollutants which, if any, may be found in your wastewater discharge as a result of a direct discharge from your pretreatment facility, process operation or from an accidental spill. – **All of the substances indicated are disposed of using Safety Kleen Systems, Inc.**

9. Please list names of Certified Operators currently employed by your facility. Include Certification Number, Classification and Expiration Date of Certification.

Name: NA Certification Number: NA

Class: NA Expiration Date: NA

Name: NA Certification Number: NA

Class: NA Expiration Date: NA

Section 5 Wastewater Characteristics

1. Attach the most recent laboratory data, which characterize the facility discharge to the sewer system. Indicate the sampling location, time and date of sample collection, and type of sample collected (grab or composite). All sampling and analysis shall be performed in accordance with section 5.4.3 of the City of Elkhart Sewer Use and Rate Ordinance No. 4866 (40 CFR Part 136) – **No waste from manufacturing processes is disposed of in the municipal sewer system. However, we have attached profile reports of our waste that is disposed of using Safety Kleen Systems, Inc.**

2. If no sampling data are available, testing MUST be performed on the discharge for any pollutant that may be present. The sample must be taken during normal production activity and be representative of typical wastewater flows and constituents. The parameters analyzed shall include all pollutants indicated on Table 1 that may be present in your waste stream (conventional, nonconventional and priority pollutants).

3. The City of Elkhart Public Works & Utilities reserves the right to require additional testing to characterize the facility discharge.

Section 6 Mailing Address

1. Please send completed application with all supporting attachments and enclosures to:

**PUBLIC WORKS & UTILITIES
LABORATORY & PRETREATMENT DIVISION
1201 SOUTH NAPPANEE STREET
ELKHART, IN 46516
ATTN: LYNN BRABEC**

2. For assistance in completing the application, call the LABORATORY & PRETREATMENT DIVISION, at (574) 293-2572.

**City of Elkhart Public Works & Utilities
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Table 1 – Pollutants

Section 1 Priority Pollutants

A. Metals and Inorganics

- ☐ Antimony; Sb
- ☐ Arsenic; As
- ☐ Asbestos
- ☒ Beryllium; Be
- ☒ Cadmium; Cd
- ☒ Chromium; Cr
- ☒ Copper; Cu
- ☐ Cyanides; CN
- ☒ Lead; Pb
- ☒ Mercury; Hg
- ☒ Nickel; Ni
- ☐ Selenium; Se
- ☒ Silver; Ag
- ☐ Thallium; Tl
- ☒ Zinc; Zn

B. Toxic Organics: Ethers

- ☐ Ether, bis(2-chloroethyl)
- ☐ Ether, bis(2-chloroisopropyl)
- ☐ Ether, 2-chloroethyl vinyl
- ☐ Ether, 4-chlorophenyl phenyl
- ☐ Ether, 4-bromophenyl phenyl
- ☐ Bis (2-chloroethoxy) methane

C. Toxic Organics: Phthalates

- ☐ Phthalate, dimethyl; DMP
- ☐ Phthalate, diethyl; DEP
- ☐ Phthalate, di-n-butyl; DBP
- ☐ Phthalate, di-n-octyl; DOP
- ☐ Phthalate, bis (2-ethylhexyl); DEHP
- ☐ Phthalate, butyl benzyl; BBP

D. Toxic Organics: Nitrogen Compounds

- ☐ Nitrosamine, dimethyl
- ☐ Nitrosamine, diphenyl
- ☐ Nitrosamine, di-n-propyl
- ☐ Benzidine
- ☐ Benzidine, 3, 3'-dichloro
- ☐ Hydrazine, 1,2-diphenyl
- ☐ Acrylonitrile

E. Toxic Organics: Phenols

- ☐ Phenol
- ☐ Phenol, 2-chloro
- ☐ Phenol, 2,4-dichloro; 2,4-DCP
- ☐ Phenol, 2,4,6-trichloro
- ☐ Phenol, pentachloro; PCP
- ☐ Phenol, 2-nitro
- ☐ Phenol, 4-nitro
- ☐ Phenol, 2,4-dinitro; 2,4-DNP
- ☐ Phenol, 2,4-dimethyl
- ☐ m-Cresol, p-chloro
- ☐ o-Cresol, 4,6-dinitro; DNOC

F. Toxic Organics: Aromatics

- ☒ Benzene
- ☐ Benzene, chloro
- ☐ Benzene, 1,2-dichloro
- ☐ Benzene, 1,3-dichloro
- ☐ Benzene, 1,4-dichloro
- ☐ Benzene, 1,2,4-trichloro
- ☐ Benzene, hexachloro; HCB
- ☒ Benzene, ethyl
- ☐ Benzene, nitro
- ☐ Toluene
- ☐ Toluene, 2,4-dinitro; DNT
- ☐ Toluene, 2,6-dinitro

G. Toxic Organics: Polynuclear Aromatic Hydrocarbons

- ☐ 2-Chloronaphthalene
- ☐ Benzo (a) anthracene
- ☐ Benzo (b) fluoranthene; B(b)F
- ☐ Benzo (k) fluoranthene; B(k)F
- ☐ Benzo (a) pyrene; BaP
- ☐ Ideno (1,2,3-cd) pyrene; IP
- ☐ Dibenzo (a,b) anthracene; DBA
- ☐ Acenaphthene
- ☐ Acenaphthythylene
- ☐ Anthracene
- ☐ Chrysene
- ☐ Fluoranthene
- ☐ Fluorene
- ☒ Naphthalene
- ☐ Phenanthrene
- ☐ Pyrene

H. Toxic Organics: PCB's

- ☐ PCB-1016; Arochlor 1016
- ☐ PCB-1221; Arochlor 1221
- ☐ PCB-1232; Arochlor 1232
- ☐ PCB-1242; Arochlor 1242
- ☐ PCB-1248; Arochlor 1248
- ☐ PCB-1254; Arochlor 1254
- ☐ PCB-1260; Arochlor 1260

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I. Toxic Organics: Halogenated Hydrocarbons Halogenated

Aliphatics

- ☒ Methane Chloro; Methyl chloride
- ☒ Methane, Dichloro; Methylene chloride
- ☐ Methane, trichloro; Chloroform
- ☐ Methane, tetrachloro; Carbon tetrachloride
- ☐ Ethane, chloro
- ☐ Ethane, 1,1-dichloro
- ☐ Ethane, 1,2-dichloro
- ☐ Ethane, 1,1,1-trichloro
- ☐ Ethane, 1,1,2-trichloro
- ☐ Ethane, 1,1,2,2-tetrachloro
- ☐ Ethane, hexachloro
- ☐ Ethene, chloro; Vinyl chloride
- ☐ Propane, 1,2-dichloro
- ☐ Propene, 1,3-dichloro
- ☒ Butadiene, hexachloro; HCB
- ☐ Cyclopentadiene, hexachloro; HCCPD
- ☐ Methane, bromo; Methyl bromide
- ☐ Methane, dichlorobromo
- ☐ Methane, chlorodibromo
- ☐ Methane, Tribromo; Bromoform
- ☐ Ethene, trichloro
- ☐ Ethene, 1,1-dichloro; 1,1-DCE
- ☐ Ethene, 1,2-trans-dichloro
- ☐ Ethene, tetrachloro

J. Toxic Organics: Pesticides

- ☐ alpha-Endosulfan
- ☐ Endosulfan sulfate
- ☐ beta-Endosulfan
- Hexachlorocyclohexanes:
- ☐ alpha-BHC
- ☐ beta-BHC
- ☐ delta-BHC
- ☐ gamma-BHC; Lindane
- ☐ Aldrin; HHDN
- ☐ Dieldrin; HEOD
- ☐ 4,4'-DDE
- ☐ 4,4'-DDT; p,p'-DDT
- ☐ 4,4-DDD; p,p'-DDD; p,p'-TDE
- ☐ Endrin
- ☐ Endrin aldehyde
- ☐ Heptachlor
- ☐ Heptachlor epoxide
- ☐ Chlordane
- ☐ Toxaphene

K. Toxic Organics: Oxygenated Compounds

- ☐ Acrolein

L. Toxic Organics: Miscellaneous

- ☐ Isophorone
- ☐ 2,3,7,8-tetrachlorodibenzo-p-dioxin; TCDD; dioxin

Section 2 Conventional Pollutants

- ☐ Carbonaceous Biochemical Oxygen (cBOD₅) > 250 mg/L
- ☐ 10 units < pH < 5 units
- ☐ Total Suspended Solids (TSS) > 250 mg/L
- ☒ Oil and Grease (O & G)

Section 3 Nonconventional Pollutants

- ☐ Ammonia (NH₃-N)
- ☒ Surfactants
- ☒ Phosphorus, Total

SECTION 2
CITY OF ELKHART PUBLIC WORKS & UTILITIES INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION

1. Provide a DETAILED written description of the manufacturing process or service activity provided on the premises.

Riverside Tool Corp. manufactures and services cutting tools for the woodworking and plastics industries. The cutting tools are machined and ground within the facility and many times are put through a black oxide process or electroplating process before shipment.

Two flow diagrams illustrating these processes, referenced as 'New Tooling Flow Diagram' and 'Tool Servicing Flow Diagram', are attached as separate documents to this application.

For cutting tool service and manufacturing (SIC 3545), coolants, lubricants, and cleaning solutions are utilized during machining, grinding, and cleaning of metal. These chemicals are as follows (See MSDS Book for details):

- Clearedge 6519
- IonoPlus 3000 ET
- GrindKlean
- Transogrind 250
- De-ionized water
- X10

All liquids are re-circulated within the machine. When machines require cleaning or maintenance, if necessary, the lubricant/coolant/cleaning solution is transferred out of the machine into the designated container (Disposal Tote 2) which is periodically pumped out by Safety Kleen Systems, Inc and hauled away for proper disposal.

For Electroplating and Black Oxide conditioning of tools (SIC 3471), tools are dipped in various liquids. Below is a sequential listing of the chemicals that tools are moved through for each process (See MSDS Book for details):

Black Oxide Process

- Safe Scrub ST Biodegradable Cleaner
- De-Ionized Water
- Birchwood Casey Oxyprime Surface Conditioner
- De-Ionized Water
- Tru Temp XL Blackener
- De-Ionized Water
- Dri-Touch Plus IPR3 Rust Preventative

SECTION 2

CITY OF ELKHART PUBLIC WORKS & UTILITIES INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION

Electroplating Process

- Electroscrub
- De-Ionized Water
- De-Ionized Water
- Metal Activator Solution
- De-Ionized Water
- De-Ionized Water
- Bright Nickel Solution
- De-Ionized Water
- De-Ionized Water
- Bright Copper Catalyst & Bright Copper MakeUp (Combined)
- De-Ionized Water
- De-Ionized Water
- Bright Nickel Solution
- De-Ionized Water

Stripping of ElectroPlating

- Electro-Strip
- De-Ionized Water & Baking Soda (Combined)
- De-Ionized Water

The De-Ionized Water listed above is transferred to the designated container (Disposal Tote 1) periodically as needed (for proper disposal with Safety Kleen Systems, Inc.) and refilled with De-Ionized Water. Any disposal of the other chemicals listed is rare and they are transferred to the designated container (Disposal Tote 1) for later disposal using Safety Kleen Systems, Inc..

2. Principle raw materials used:

- Tungsten Carbide (C3, C4)
- Steel (4140, C1018, 301/304 Stainless, M2, M3)
- Aluminum (6061)
- M42 Alloy
- Polycrystalline Diamond
- Copper
- Brass
- Nickel

3. Chemicals and compounds used (include MSDS for each)

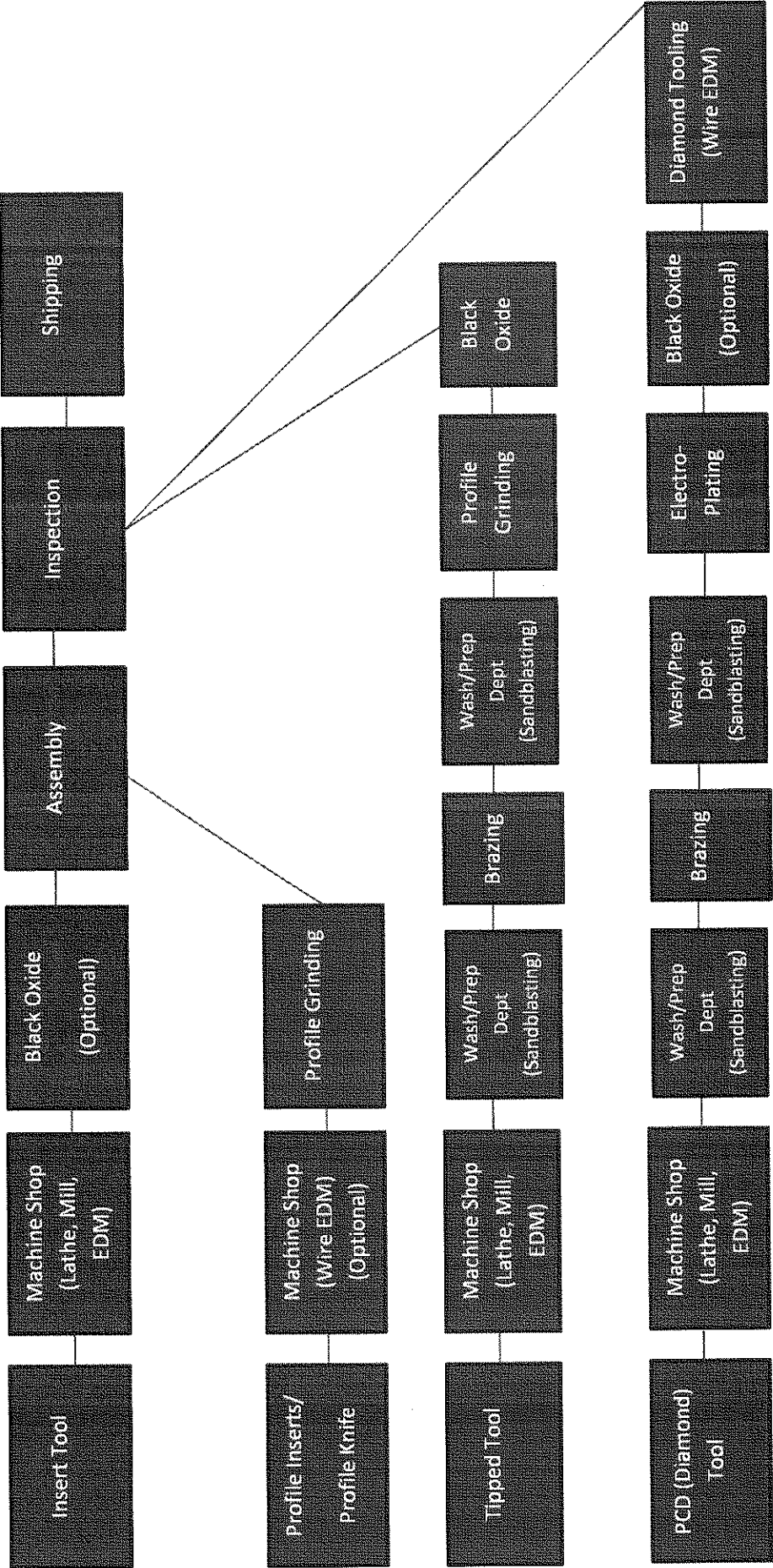
See previously submitted binder of MSDS sheets.

SECTION 2

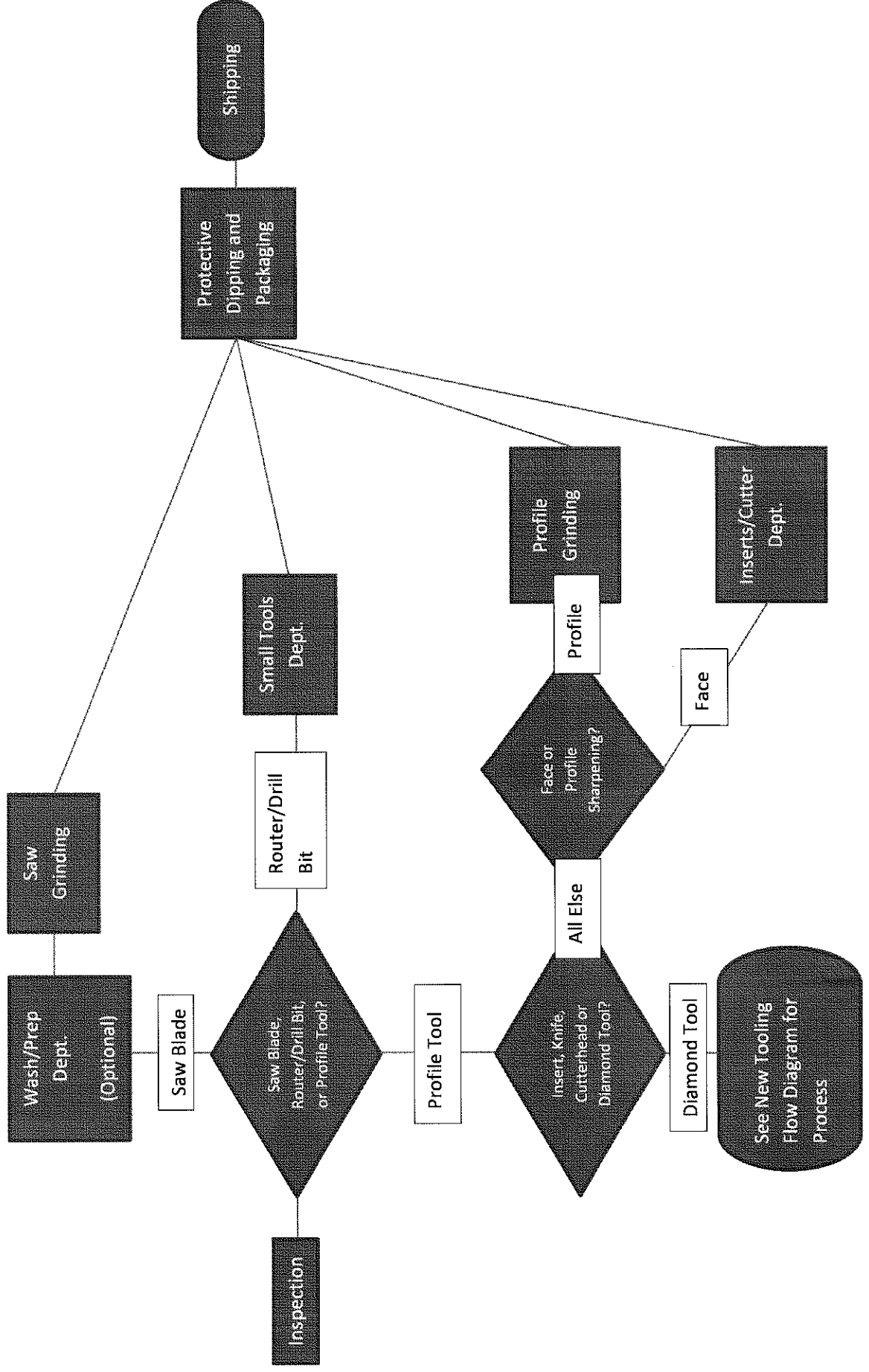
CITY OF ELKHART PUBLIC WORKS & UTILITIES INDUSTRIAL WASTEWATER DISCHARGE PERMIT APPLICATION

4. Hours of process discharge into the sewer system per day:
There are zero hours of process discharge into the municipal sewer system. No manufacturing process discharges any liquid into the municipal sewer system. All oils, coolant, grease, and liquids from the manufacturing, grinding, electroplating and black oxide processes are collected in designated containers and transferred to Safety-Kleen Systems, Inc. for proper disposal.

New Tooling Flow Diagram



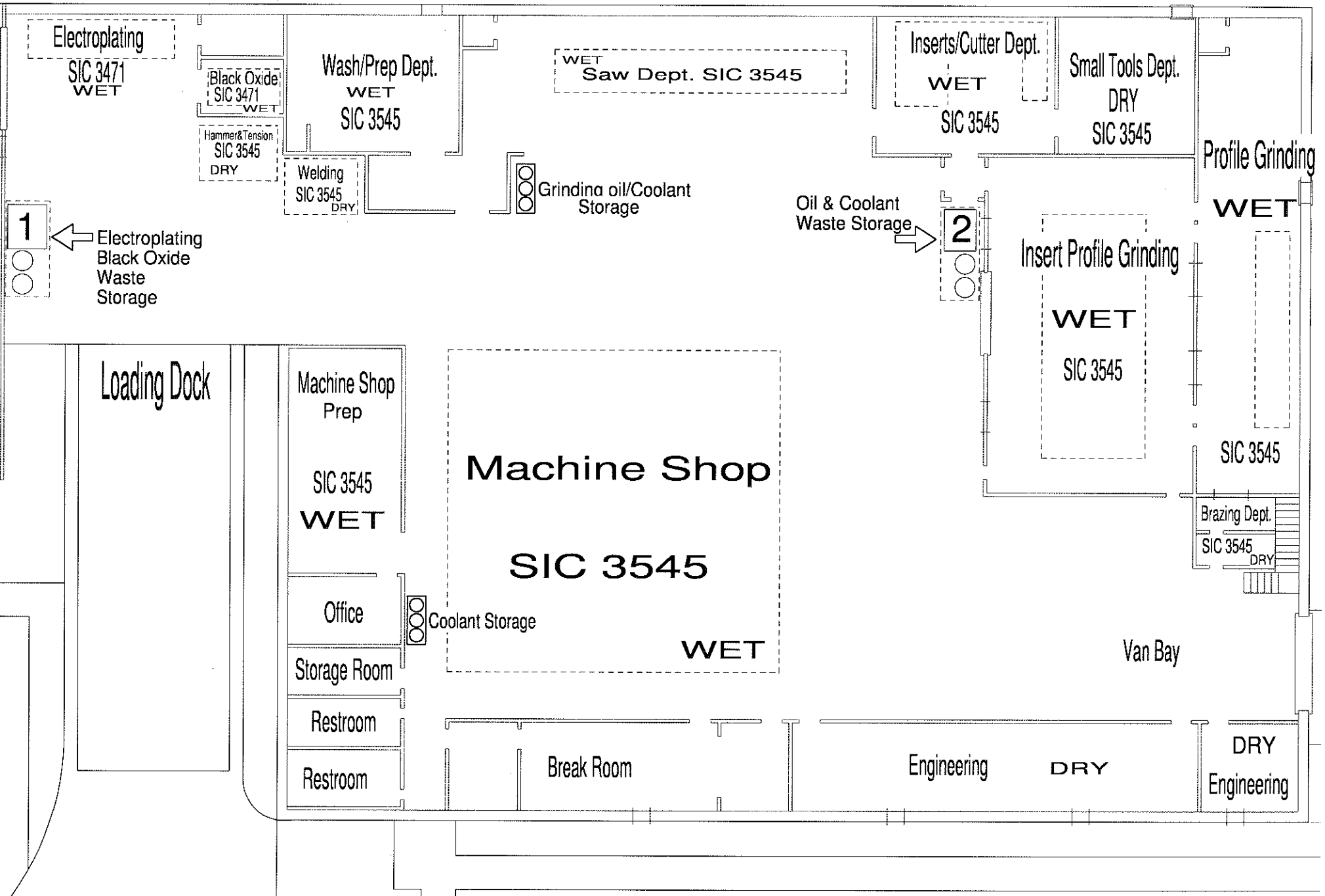
Tool Servicing Flow Diagram

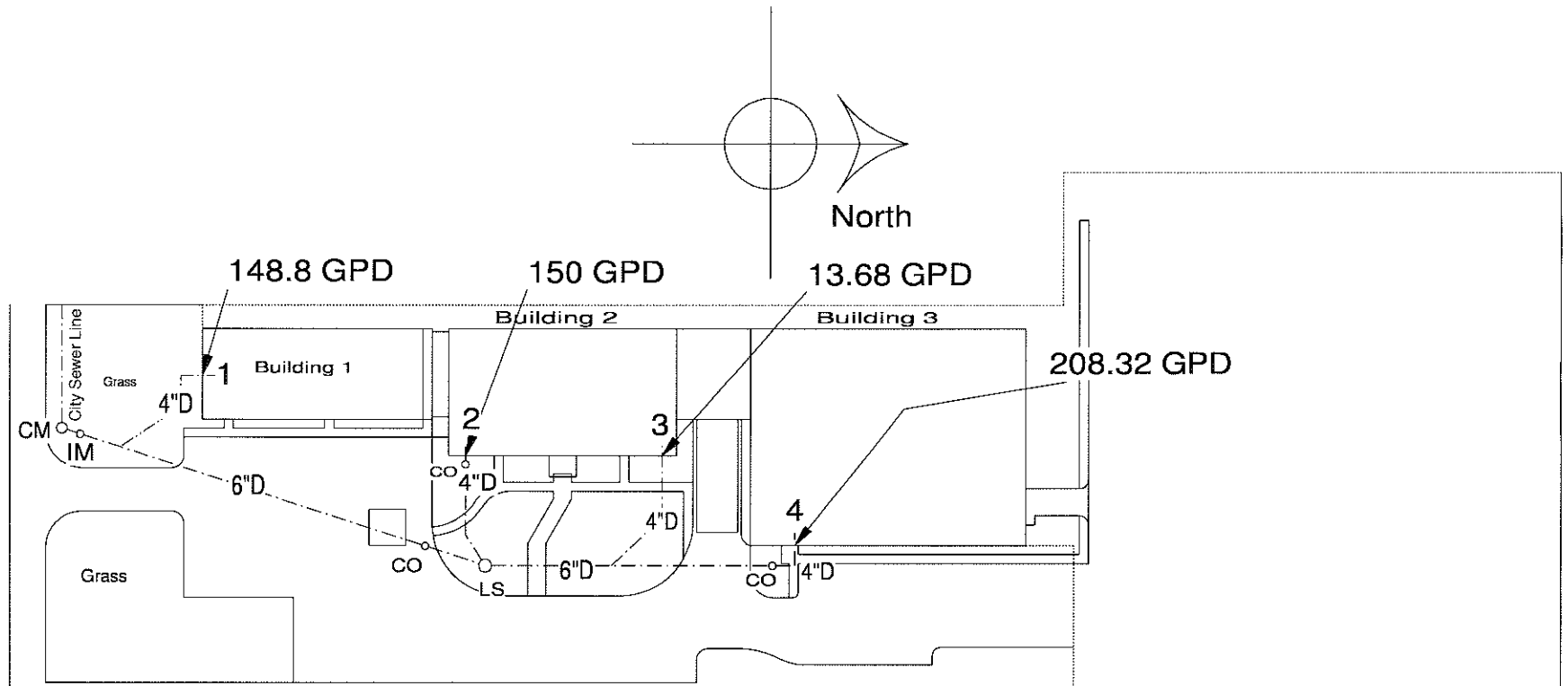


Building 2



Building 3





Symbols

- LS Lift Station
- CM Man Hole
- IM Inspection Man Hole
- CO Clean Out